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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

DOUGLAS G. MAIER,)	
)	Case No. 98-1095-ST
Plaintiff,)	
)	
v.)	AFFIDAVIT OF SARAH J. RYAN In
)	Support of Motion for Summary Judgment
PACIFIC HERITAGE HOMES, INC., an)	
Oregon corporation, PACIFIC SANTA FE)	
CORPORATION dba PACIFIC LAND)	
MANAGEMENT, INC., and MARK)	
ROCKWELL,)	
)	
Defendants.)	

SARAH J. RYAN, being first duly sworn, deposes and states as follows:

1. I am an attorney with the law firm Ball Janik LLP, counsel for defendants in the above-entitled matter. I make this affidavit upon personal knowledge and in support of defendants' Motion for Summary Judgment.

2. Attached hereto are true and correct copies of the following documents and their corresponding, respective exhibit numbers:

<u>Exhibit</u>	<u>Document</u>
1	Termination of Employment letter dated September 23, 1997
2	Severance Benefits letter dated September 25, 1997
3	Offer of Employment letter dated June 3, 1996
4	Interoffice memo to Mark Rockwell from Doug Maier dated September 26, 1997

Attached are true and correct copies of excerpts from the following deposition:

<u>Deponent</u>	<u>Date</u>
Douglas G. Maier	July 27-28, 1998

DATED this _____ day of June, 1999.

Sarah J. Ryan

The foregoing instrument was acknowledged before me on this _____ day of June, 1999.

NOTARY PUBLIC FOR OREGON
My Commission Expires: _____